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November 8, 2019

**VIA ECF**

Hon. Anne Y. Shields  
U.S. Magistrate Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Shawn Garrett v. Friends Academy, et al.*, Case No.: 2:18-cv-3081  
**Defendants' Response to Recent Correspondence**

Dear Judge Shields:

This law firm represents Defendants Friends Academy, Mark Schoeffel, William Morris, Mary Alice Kolodner, Deborah Schoman, Andrea Kelly, Ann Marie Tidona and Robin Wilpon Wachtler (collectively, the "Defendants") in the above-referenced matter. We write in response to Plaintiff Shawn Garrett's letter dated November 4, 2019 and the Stagg Wabnik Law Group's motion to withdraw as Plaintiff's counsel, which was filed November 6, 2019.

Defendants do not oppose the Stagg Wabnik Law Group's motion to withdraw as Plaintiff's counsel. It appears from Plaintiff's November 4, 2019 letter that Plaintiff does not oppose the Stagg Wabnik Law Group's motion either. Defendants respectfully request, however, that Plaintiff's substitution of counsel not unnecessarily delay the litigation of this action. The current discovery deadline has passed, and but-for the Stagg Wabnik Law Group's motion to withdraw as counsel, the parties would likely have begun dispositive motion practice.

Defendants also feel compelled to respond to Plaintiff's assertion in her November 4, 2019 letter in which she stated that "the defense has not produced documents in response to at least 15 of our numbered requests." Defendants duly served their responses and objections to Plaintiff's first document demands on May 22, 2019. To date, Defendants have produced more than 11,000 pages of records in response to Plaintiff's document demands. Defendants have also participated in several telephone conferences with Plaintiff's current attorneys to resolve any discovery



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disputes in good faith. Accordingly, Defendants deny any suggestion that they have improperly failed to respond to any of Plaintiff's discovery demands.

Respectfully,

/s/ Nicholas M. Reiter

Nicholas M. Reiter

cc: Debra L. Wabnik, Esq. (via ECF)  
*Counsel for Plaintiff Shawn Garrett*

Plaintiff Shawn Garrett (via ECF)